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**BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. 2008-349

KELLEY MOORE BLEDSOE AKA KELLEY
BLEDSOE-LEFSTEIN
2451 255th Street
Lomita, CA 90717

ACCUSATION

Registered Nurse License No. 615418

Respondent.

Complainant alleges:

PARTIES

1. Ruth Ann Terry, M.P.H, R.N. (Complainant) brings this Accusation solely
in her official capacity as the Executive Officer of the Board of Registered Nursing.

2. On or about March 14, 2003, the Board of Registered Nursing (Board)
issued Registered Nurse License Number 615418 to Kelley Moore Bledsoe (Respondent). The
Registered Nurse License was in full force and effect at all times relevant to the charges brought
herein and will expire on August 31, 2008, unless renewed.

JURISDICTION

3. This Accusation is brought before the Board of Registered Nursing, under
the authority of the following laws. All section references are to the Business and Professions
Code unless otherwise indicated.

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1 4. Section 2750 of the Business and Professions Code ("Code") provides, in
2 pertinent part, that the Board may discipline any licensee, including a licensee holding a
3 temporary or an inactive license, for any reason provided in Article 3 (commencing with section
4 2750) of the Nursing Practice Act.

5 5. Section 2761 of the Code states:

6 "The board may take disciplinary action against a certified or licensed nurse or
7 deny an application for a certificate or license for any of the following:

8 "(a) Unprofessional conduct, which includes, but is not limited to, the following:

9 "(1) Incompetence, or gross negligence in carrying out usual certified or licensed
10 nursing functions.

11

12 "(d) Violating or attempting to violate, directly or indirectly, or assisting in or
13 abetting the violating of, or conspiring to violate any provision or term of this chapter [the
14 Nursing Practice Act] or regulations adopted pursuant to it.

15

16 "(f) Conviction of a felony or of any offense substantially related to the
17 qualifications, functions, and duties of a registered nurse, in which event the record of the
18 conviction shall be conclusive evidence thereof.

19

20 6. Section 2762 of the Code states:

21 "In addition to other acts constituting unprofessional conduct within the meaning
22 of this chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed
23 under this chapter to do any of the following:

24 "(a) Obtain or possess in violation of law, or prescribe, or except as directed by a
25 licensed physician and surgeon, dentist, or podiatrist administer to himself or herself, or furnish
26 or administer to another, any controlled substance as defined in Division 10 (commencing with
27 Section 11000) of the Health and Safety Code or any dangerous drug or dangerous device as
28 defined in Section 4022.

1 "(b) Use any controlled substance as defined in Division 10 (commencing with
2 Section 11000) of the Health and Safety Code, or any dangerous drug or dangerous device as
3 defined in Section 4022, or alcoholic beverages, to an extent or in a manner dangerous or
4 injurious to himself or herself, any other person, or the public or to the extent that such use
5 impairs his or her ability to conduct with safety to the public the practice authorized by his or her
6 license.

7 "(c) Be convicted of a criminal offense involving the prescription, consumption,
8 or self-administration of any of the substances described in subdivisions (a) and (b) of this
9 section, or the possession of, or falsification of a record pertaining to, the substances described in
10 subdivision (a) of this section, in which event the record of the conviction is conclusive evidence
11 thereof.

12

13 "(e) Falsify, or make grossly incorrect, grossly inconsistent, or unintelligible
14 entries in any hospital, patient, or other record pertaining to the substances described in
15 subdivision (a) of this section."

16 7. Health and Safety Code Section 11368 provides, as follows:

17 "Every person who forges or alters a prescription or who issues or utters an altered
18 prescription, or who issues or utters a prescription bearing a forged or fictitious signature for any
19 narcotic drug, or who obtains any narcotic drug by any forged, fictitious or altered prescription,
20 or who has in possession any narcotic drug secured by a forged, fictitious, or altered prescription,
21 shall be punished by imprisonment in the county jail for not less than six months nor more than
22 one year, or in the state prison."

23 8. Health and Safety Code Section 11173 provides, as follows:

24 "(a) No person shall obtain or attempt to obtain controlled substances, or procure
25 or attempt to procure the administration of or prescription for controlled substances, by fraud,
26 deceit, misrepresentation, or subterfuge or the concealment of a material fact."

27 9. Health and Safety Code section 11377(a) provides that it is illegal to
28 possess a controlled substance without a valid prescription.

1 10. California Code of Regulations, title 16, section 1443, states:
2 "As used in Section 2761 of the code, 'incompetence' means the lack of possession
3 of or the failure to exercise that degree of learning, skill, care and experience ordinarily possessed
4 and exercised by a competent registered nurse as described in Section 1443.5."
5 11. California Code of Regulations, title 16, section 1444, states:
6 "A conviction or act shall be considered to be substantially related to the
7 qualifications, functions or duties of a registered nurse if to a substantial degree it evidences the
8 present or potential unfitness of a registered nurse to practice in a manner consistent with the
9 public health, safety, or welfare. Such convictions or acts shall include but not be limited to the
10 following:
11
12 "(c) Theft, dishonesty, fraud, or deceit."
13 12. Section 2764 of the Code provides, in pertinent part, that the expiration of
14 a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding
15 against the licensee or to render a decision imposing discipline on the license.
16 13. Section 118, subdivision (b), of the Code provides that the suspension
17 and/or expiration of a license shall not deprive the Board of jurisdiction to proceed with a
18 disciplinary action during the period within which the license may be renewed, restored, reissued
19 or reinstated.
20 14. Section 125.3 of the Code provides, in pertinent part, that the Board may
21 request the administrative law judge to direct a licensee found to have committed a violation or
22 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
23 and enforcement of the case.
24 15. DEFINITIONS
25 A. **"Demerol,"** is the brand name of meperidine hydrochloride, is a Schedule
26 II controlled substance as designated by Health and Safety Code section 11055(c)(17), and is
27 categorized as a dangerous drug pursuant to Business and Professions Code section 4022.
28 B. **"Dilaudid,"** is a schedule II controlled substance pursuant to Health and

1 Safety Code section 11055 (b) (1)(K) and a “dangerous drug” pursuant to Business and
2 Professions Code section 4022.

3 D. **“Morphine,”** is classified as a Schedule II controlled substance pursuant
4 to Health and Safety Code section 11055, subdivision (b) (1)(M), and is categorized as a
5 “dangerous drug” pursuant to Business and Professions Code section 4022.

6 E. **“Norco”** is classified as a Schedule II controlled substance pursuant to
7 Health and Safety Code section 11055, subdivision (b) (1)(J), and is categorized as a “dangerous
8 drug” pursuant to Business and Professions Code section 4022.

9 F. **“Oxycodone”** is classified as a Schedule II controlled substance pursuant
10 to Health and Safety Code section 11055, subdivision (b)(1)(N), and is categorized as a
11 “dangerous drug” pursuant to Business and Professions Code section 4022. Oxycontin is a trade
12 name for Oxycodone with hydrochloride.

13 G. **“Percocet,”** is the brand name for Oxycodone with Acetaminophen. It is
14 classified as a Schedule II controlled substance pursuant to Health and Safety Code section
15 11055, subdivision (b)(1)(N), and is categorized as a “dangerous drug” pursuant to Business and
16 Professions Code section 4022.

17 H. **“Vicodin,”** is the brand name for Hydrocodone with Acetaminophen. It is
18 classified as a Schedule III controlled substance pursuant to Health and Safety Code Section
19 11056, subdivision (e)(5), and is categorized as a “dangerous drug” pursuant to Business and
20 Professions Code section 4022.

21 I. **“Omniceil,”** is a computerized automated medication distribution system
22 that operates similarly to an automated teller machine at a bank. Medications can be withdrawn
23 from the Omnicell machines only by an authorized staff person using his or her own personalized
24 access code. The Omnicell machine makes a record of the medication and dose, date and time it
25 was withdrawn, the user identification, and the patient for whom it was withdrawn.

26 FIRST CAUSE FOR DISCIPLINE

27 (Conviction of Substantially Related Crime)

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16. Respondent is subject to disciplinary action under Section 2750, in

1 conjunction with section 2761, subdivision (f) of the Code, as defined in California Code of
2 Regulations, Title 16, Section 1444, subdivision (c), for unprofessional conduct, in that
3 Respondent has been convicted of a crime substantially related to the qualifications, functions, or
4 duties of a registered nurse, as follows:

5 a. On or about March 20, 2008, in the Superior Court of California, County
6 of Los Angeles, in a case entitled *The People of the State of California v. Kelley Moore Bledsoe*
7 (Case No. 7WW04360), Respondent was convicted on her plea of nolo contendere for violating
8 Penal Code Section 484(a) - Petty Theft, a misdemeanor.

9 b. The facts and circumstances surrounding the conviction are that on or
10 about April 12, 2007, Respondent admitted to a detective with the Whittier Police Department,
11 that while performing nursing duties at Whittier Hospital, she diverted narcotics from the
12 hospital, which she self administered using a needle also taken from the hospital.

13 SECOND CAUSE FOR DISCIPLINE

14 (Falsified/Grossly Inconsistent Hospital Records)

15 17. Respondent is subject to disciplinary action under section 2762,
16 subdivision (e), and California Code of Regulations, title 16, section 1444, for unprofessional
17 conduct, in that while employed as a registered nurse at Saint John's Health Center, Respondent
18 falsified, made grossly incorrect, grossly inconsistent, or unintelligible entries in hospital and
19 patient records pertaining to controlled substances and dangerous drugs in the following respects:

20 Patient No. 1

21 a. On or about March 27, 2006, the Omnicell report indicates that
22 Respondent removed 2 mg of Morphine at 1156 hours, and one 5 mg tablet of Vicodin at 1821
23 hours. Respondent failed to document the administration of the medication in the Medication
24 Administration Records (MAR's) or Nursing Notes and failed to record wastage or otherwise
25 account for the Morphine and Vicodin. The physician's orders were for Vicodin 1 tablet every 8
26 hours as needed for pain, and Morphine 4 mg every 4 hours as needed for moderate-extreme
27 pain.

28 b. On or about March 28, 2006, the Omnicell report indicates that

1 Respondent removed 8 mg of Morphine at 1710 hours, and one 5 mg tablet of Vicodin at 1451
2 hours. However, Respondent only documented administering 4 mg of Morphine in the
3 Medication Administration Records (MAR's), and failed to record wastage or otherwise account
4 for the remaining 4 mg of Morphine and one Vicodin tablet. The physician's orders were for
5 Morphine 4 mg every four hours as needed for extreme pain.

6 c. On or about April 3, 2006, the Omnicell report indicates that Respondent
7 removed 8 mg of Morphine at 0819 hours, and another 8 mg tablet of Morphine at 1153 hours.
8 Respondent only documented administering 4 mg of Morphine in the Medication Administration
9 Records (MAR's), and failed to record wastage or otherwise account for the remaining 12 mg of
10 Morphine. The physician's orders were for 4 mg of Morphine every three hours as needed for
11 severe pain.

12 Patient No. 2

13 a. On or about March 3, 2006, the Omnicell report indicates that Respondent
14 removed 3 mg of Morphine at 2000 hours. Respondent failed to document the administration of
15 the medication in the Medication Administration Records (MAR's) or Nursing Notes, and failed
16 to record wastage or otherwise account for the 3 mg of Morphine.

17 b. On or about March 30, 2003, the Omnicell report indicates that
18 Respondent removed 8 mg of Morphine at 1104 hours, and wasted 3 mg at 2000 hours.
19 However, Respondent failed to document the administration of the medication in the Medication
20 Administration Records (MAR's) or Nursing Notes, and failed to record wastage or otherwise
21 account for the 5 mg of Morphine. The physician's orders were for Morphine 2-4 mg every 4
22 hours as needed for moderate pain.

23 Patient No. 3

24 a. On or about March 30, 2006, the Omnicell report indicates that
25 Respondent removed two 10 mg tablets of Norco at 1221 hours, one 4 mg tablet of Dilaudid at
26 1222 hours, one 2 mg tablet of Dilaudid at 1740, and two 10 mg tablets of Norco at 1850.
27 Respondent failed to document the administration of the medication in the Medication
28 Administration Records (MAR's) or Nursing Notes and failed to record wastage or otherwise

1 account for the 4 tablets of Norco and 2 tablets of Dilaudid.

2 Patient No. 4

3 a. On or about March 30, 2006, the Omnicell report indicates that
4 Respondent removed 2 mg of Morphine at 1156 hours, and one 5 mg tablet of Vicodin at 1821
5 hours. Respondent failed to document the administration of the medication in the Medication
6 Administration Records (MAR's) or Nursing Notes and failed to record wastage or otherwise
7 account for the Morphine and Vicodin. The physician's orders were for Vicodin 1 tablet every 8
8 hours as needed for pain, and Morphine 4 mg every 4 hours as needed for moderate-extreme
9 pain.

10 Patient No. 5

11 a. On or about April 3, 2006, the Omnicell report indicates that Respondent
12 removed two 7.5 mg tablets of Vicodin at 1155 hours. Respondent failed to document the
13 administration of the medication in the Medication Administration Records (MAR's) or Nursing
14 Notes and failed to record wastage or otherwise account for the Vicodin. The physician's orders
15 were for Vicodin 2 tablets every 3 hours as needed for severe pain.

16 Patient No. 6

17 a. On or about April 3, 2006, the Omnicell report indicates that Respondent
18 removed a total of 24 mg of Morphine at 0749, 1028, and 1402 hours; 2 tablets of Oxycodone
19 (Percocet) at 1158. Respondent only documented administering 18 mg of Morphine in the
20 Medication Administration Records (MAR's) or Nursing Notes. The remaining 6mg of
21 Morphine and two Percocet tablets were unaccounted for. The physician's orders were for
22 Morphine 6 mg 2 every 3 hours as needed for pain, and 1-2 tablets of Percocet every 3 hours as
23 needed for pain.

24 THIRD CAUSE FOR DISCIPLINE

25 (Obtained Controlled Substances by Fraud or Deceit)

26 18. Respondent is subject to disciplinary action under section 2762,
27 subdivision (a), in conjunction with Health and Safety Code section 11173, subdivision (a), as
28 follows:

a. Between approximately March 3, 2006 through approximately April 3, 2006, while employed as a registered nurse at St. John's Health Center, Respondent diverted narcotics intended for patients, as more fully set forth above in paragraph 17.

b. On or about April 12, 2007, Respondent, by her own admission, unlawfully obtained and possessed controlled substances, while employed as a registered nurse at Whittier Hospital, as more fully set forth above in paragraph 16.

FOURTH CAUSE FOR DISCIPLINE

(Use of Controlled Substances)

19. Respondent is subject to disciplinary action under section 2762, subdivision (b), for unprofessional conduct, as follows:

a. On or about April 3, 2006, Respondent submitted to a drug screening during the course of her duties as a registered nurse at St. John's Health Center, which revealed that she tested positive for Morphine and Propoxyphene.

b. On or about April 12, 2007, Respondent, by her own admission, diverted and self-administered controlled substances while employed as a registered nurse at Whittier Hospital, as more fully described in paragraph 16 above.

FIFTH CAUSE FOR DISCIPLINE

(Prescription Forgery)

20. Respondent is subject to disciplinary action under section 2762, subdivision (a), in conjunction with Health and Safety Code section 11368, in that on or between March 25, 2005 and May 20, 2007, Respondent, in collusion with her husband, Howard Lefstein, obtained controlled substances by forging prescriptions on forms diverted from several physicians. The circumstances are as follows:

a. On or about March 25, 2005, Respondent and her husband obtained Hydrocodone (40 Tabs) at Costco Pharmacy in Torrance, CA, by submitting a false prescription (No. 323862), that was purportedly prescribed by Dr. James Wethe to Howard Lefstein. However, Dr. Wethe neither authorized prescriptions for Howard Lefstein, nor was he a patient of Dr. Wethe. Respondent diverted the prescriptions forms belonging to Dr. Wethe while

1 working in his OR.

2 b. On or about April 15, 2005, Respondent and her husband obtained
3 Hydrocodone (40 Tabs) at Costco Pharmacy in Torrance, CA., by submitting a false prescription
4 (No. 327242), that was purportedly prescribed by Dr. James Wethe to Howard Lefstein.
5 However, Dr. Wethe neither authorized prescriptions for Howard Lefstein, nor was he a patient
6 of Dr. Wethe. Respondent diverted the prescriptions forms belonging to Dr. Wethe while
7 working in his OR.

8 c. On or about April 27, 2005, Respondent and her husband obtained
9 Hydrocodone (40 Tabs and 2X refill) at Costco Pharmacy in Torrance, CA., by submitting a false
10 prescription (No. 329106), that was purportedly prescribed by Dr. James Wethe to Howard
11 Lefstein. However, Dr. Wethe neither authorized prescriptions for Howard Lefstein, nor was he
12 a patient of Dr. Wethe. Respondent diverted the prescriptions forms belonging to Dr. Wethe
13 while working in his OR.

14 d. On or about May 4, 2005, Respondent obtained Hydrocodone Syrup (1
15 pint and 1X Refill) at Costco Pharmacy in Torrance, CA., by submitting a false prescription (No.
16 330122), purportedly prescribed by Dr. John McKissock. However, Dr. McKissock neither
17 authorized prescriptions for Respondent, nor was she a patient of Dr. McKissock. Respondent
18 diverted the prescriptions forms belonging to Dr. McKissock while working in his OR.

19 e. On or about May 18, 2005, Respondent and her husband obtained
20 Hydrocodone (40 Tabs) at Costco Pharmacy in Torrance, CA., by submitting a false prescription
21 (No. 332368), purportedly prescribed by Dr. James Wethe to Howard Lefstein. However, Dr.
22 Wethe neither authorized prescriptions for Howard Lefstein, nor was he a patient of Dr. Wethe.
23 Respondent diverted the prescriptions forms belonging to Dr. Wethe while working in his OR.

24 f. On or about June 1, 2005, Respondent and her husband obtained
25 Hydrocodone (40 Tabs) at Costco Pharmacy in Torrance, CA., by submitting a false prescription
26 (No. 334599), purportedly prescribed by Dr. James Wethe to Howard Lefstein. However, Dr.
27 Wethe neither authorized prescriptions for Howard Lefstein, nor was he a patient of Dr. Wethe.
28 Respondent diverted the prescriptions forms belonging to Dr. Wethe while working in his OR.

1 g. On or about June 6, 2005, Respondent obtained Tussionex Suspension
2 (180 ml) at Costco Pharmacy in Torrance, CA, by submitting a false prescription (No. 335410),
3 purportedly prescribed by Dr. John McKissock. However, Dr. McKissock neither authorized
4 prescriptions for Respondent, nor was she a patient of Dr. McKissock. Respondent diverted the
5 prescriptions forms belonging to Dr. McKissock while working in his OR.

6 h. On or about June 17, 2005, Respondent obtained Hydrocodone Syrup (1
7 pint and 1X Refill) at Costco Pharmacy in Torrance, CA, by submitting a false prescription (No.
8 337317), purportedly prescribed by Dr. John McKissock. However, Dr. McKissock neither
9 authorized prescriptions for Respondent, nor was she a patient of Dr. McKissock. Respondent
10 diverted the prescriptions forms belonging to Dr. McKissock while working in his OR.

11 i. On or about June 22, 2005, Respondent and her husband obtained
12 Hydrocodone (40 Tabs) at Costco Pharmacy in Torrance, CA., by submitting a false prescription
13 (No. 338126), purportedly prescribed by Dr. James Wethe to Howard Lefstein. However, Dr.
14 Wethe neither authorized prescriptions for Howard Lefstein, nor was he a patient of Dr. Wethe.
15 Respondent diverted the prescriptions forms belonging to Dr. Wethe while working in his OR.

16 j. On or about July 12, 2005, Respondent and her husband obtained
17 Hydrocodone (40 Tabs) at Costco Pharmacy in Torrance, CA., by submitting a false prescription
18 (No. 338126), purportedly prescribed by Dr. James Wethe to Howard Lefstein. However, Dr.
19 Wethe neither authorized prescriptions for Howard Lefstein, nor was he a patient of Dr. Wethe.
20 Respondent diverted the prescriptions forms belonging to Dr. Wethe while working in his OR.

21 k. On or about April 3, 2006, Respondent obtained Hydrocodone (60 Tabs
22 and 2X Refill) at Target Pharmacy in Torrance, CA, by submitting a false prescription (No.
23 4401911), purportedly prescribed by Dr. John Moreland. However, Dr. Moreland neither
24 authorized prescriptions for Respondent, nor was she a patient of Dr. Moreland. Respondent
25 diverted the prescriptions forms while working at St. John's Hospital, where Dr. Moreland has
26 privileges.

27 l. On or about August 31, 2006, Respondent obtained Hydrocodone (60 Tabs
28 and 1X Refill) at CVS Pharmacy in Torrance, CA, by submitting a false prescription (No.

1 665954), purportedly prescribed by Dr. Steven Seizer to "Kelley Lefstein". However, Dr. Seizer
2 neither authorized prescriptions for Respondent, nor was she a patient of Dr. Seizer. Respondent
3 diverted the prescriptions forms while working at Endoscopy Center, where Dr. Seizer is on staff.

4 m. On or about September 20, 2006, Respondent obtained Hydrocodone (40
5 Tabs) at CVS Pharmacy in Torrance, CA, by submitting a false prescription (No. 4609071),
6 purportedly prescribed by Dr. Andre Aboolian to "Kelley Lefstein". However, Dr. Aboolian
7 neither authorized prescriptions for Respondent, nor was she a patient of Dr. Aboolian.
8 Respondent diverted the prescriptions forms while working in Dr. Aboolian's OR.

9 n. On or about September 27, 2006, Respondent obtained Hydrocodone (30
10 Tabs and 1X refill) at Walgreens Pharmacy in Torrance, CA, by submitting a false prescription
11 (No. 4609097), purportedly prescribed by Dr. Andre Aboolian to "Kelley Lefstein". However,
12 Dr. Aboolian neither authorized prescriptions for Respondent, nor was she a patient of Dr.
13 Aboolian. Respondent diverted the prescriptions forms while working in Dr. Aboolian's OR.

14 o. On or about September 30, 2006, Respondent obtained Hydrocodone (30
15 Tabs and 1X refill) at Walgreens Pharmacy in Torrance, CA, by submitting a false prescription
16 (No. 113600), purportedly prescribed by Dr. Aboolian to "Kelley Lefstein". However, Dr.
17 Aboolian neither authorized prescriptions for Respondent, nor was she a patient of Dr. Aboolian.
18 Respondent diverted the prescriptions forms while working in Dr. Aboolian's OR.

19 p. On or about October 10, 2006, Respondent obtained Tussionex
20 Suspension (120 ml) at CVS Pharmacy in Torrance, CA, by submitting a false prescription (No.
21 705257), purportedly prescribed by Dr. Gary Alter to "Kelley Lefstein". However, Dr. Alter
22 neither authorized prescriptions for Respondent, nor was she a patient of Dr. Alter. Respondent
23 diverted the prescriptions forms while working in Dr. Alter's OR.

24 q. On or about October 13, 2006, Respondent obtained Tussionex
25 Suspension (120 ml) at Rite Aid Pharmacy in Torrance, CA, by submitting a false prescription
26 (No. 705366), purportedly prescribed by Dr. Gary Alter to "Kelley Lefstein". However, Dr.
27 Alter neither authorized prescriptions for Respondent, nor was she a patient of Dr. Alter.
28 Respondent diverted the prescriptions forms while working in Dr. Alter's OR.

1 r. On or about October 19, 2006, Respondent obtained Hydrocodone (40
2 Tabs, 1X Refill) at Walgreens Pharmacy in Torrance, CA, by submitting a false prescription (No.
3 4609071), purportedly prescribed by Dr. Andre Aboolian to "Kelley Lefstein". However, Dr.
4 Aboolian neither authorized prescriptions for Respondent, nor was she a patient of Dr. Aboolian.
5 Respondent diverted the prescriptions forms while working in Dr. Aboolian's OR.

6 s. On or about October 22, 2006, Respondent obtained Tussionex
7 Suspension (120 ml, 1X refill) at CVS Pharmacy in Torrance, CA, by submitting a false
8 prescription (No. 705257), purportedly prescribed by Dr. Gary Alter to "Kelley Lefstein".
9 However, Dr. Alter neither authorized prescriptions for Respondent, nor was she a patient of Dr.
10 Alter. Respondent diverted the prescriptions forms while working in Dr. Alter's OR.

11 t. On or about October 24, 2006, Respondent obtained Tussionex
12 Suspension (120 ml, 1X Refill) at Rite Aid Pharmacy in Torrance, CA, by submitting a false
13 prescription (No. 705366), purportedly prescribed by Dr. Gary Alter to "Kelley Bledsoe-
14 Lefstein". However, Dr. Alter neither authorized prescriptions for Respondent, nor was she a
15 patient of Dr. Alter. Respondent diverted the prescriptions forms while working in Dr. Alter's
16 OR.

17 u. On or about October 30, 2006, Respondent obtained Hydrocodone (40
18 Tabs, 2X Refill) at Walgreens Pharmacy in Torrance, CA, by submitting a false prescription (No.
19 4609071), purportedly prescribed by Dr. Andre Aboolian to "Kelley Lefstein". However, Dr.
20 Aboolian neither authorized prescriptions for Respondent, nor was she a patient of Dr. Aboolian.
21 Respondent diverted the prescriptions forms while working in Dr. Aboolian's OR.

22 v. On or about October 15, 2006, Respondent obtained Hydrocodone (40
23 Tabs) at Vons Pharmacy in Torrance, CA, by submitting a false prescription (No. 4324647),
24 purportedly prescribed by Dr. Gary Alter to "Kelley Bledsoe-Lefstein". However, Dr. Alter
25 neither authorized prescriptions for Respondent, nor was she a patient of Dr. Alter. Respondent
26 diverted the prescriptions forms while working in Dr. Alter's OR.

27 w. On or about October 26, 2006, Respondent obtained Hydrocodone (30
28 Tabs) at Longs Drugs in Torrance, CA, by submitting a false prescription (No. 1077790),

1 purportedly prescribed by Dr. Jacqueline Lezine-Hanna to "Kelley Lefstein". However, Dr.
2 Lezine-Hanna neither authorized prescriptions for Respondent, nor was she a patient.

3 x. On or about November 3, 2006, Respondent obtained Hydrocodone (40
4 Tabs) at CVS Pharmacy in Torrance, CA, by submitting a false prescription (No. 708916),
5 purportedly prescribed by Dr. Jacqueline Lezine-Hanna to "Kelley Lefstein". However, Dr.
6 Lezine-Hanna neither authorized prescriptions for Respondent, nor was she a patient.

7 y. On or about November 8, 2006, Respondent obtained Hydrocodone (40
8 Tabs) at Target Pharmacy in Torrance, CA, by submitting a false prescription (No. 4402701),
9 purportedly prescribed by Dr. Zoppi to "Howard Lefstein". However, Dr. Lezine-Hanna neither
10 authorized prescriptions for Respondent, nor was she a patient. Respondent was identified by a
11 Target pharmacist as the individual that picked up the prescription.

12 z. On or about November 12, 2006, Respondent obtained Hydrocodone (40
13 Tabs) at CVS Pharmacy in Torrance, CA, by submitting a false prescription (No. 708916),
14 purportedly prescribed by Dr. Lezine-Hanna to "Howard Lefstein". However, Dr. Lezine-Hanna
15 neither authorized prescriptions for Mr. Lefstein, nor was he a patient.

16 aa. On or about November 16, 2006, Respondent obtained Hydrocodone (40
17 Tabs) at Target Pharmacy in Torrance, CA, by submitting a false prescription (No. 4402728),
18 purportedly prescribed by Dr. Zoppi to "Howard Lefstein". However, Dr. Zoppi neither
19 authorized prescriptions for Respondent, nor was she a patient. Respondent was identified by a
20 Target pharmacist as the individual that picked up the prescription.

21 bb. On or about November 18, 2006, Respondent obtained Hydrocodone (40
22 Tabs) at Ralph's Pharmacy in Torrance, CA, by submitting a false prescription (No. 4410158),
23 purportedly prescribed by Dr. Zoppi to Respondent. However, Dr. Zoppi neither authorized
24 prescriptions for Respondent, nor was she a patient.

25 cc. On or about November 26, 2006, Respondent obtained Hydrocodone (40
26 Tabs, 1X Refill) at Ralph's Pharmacy in Torrance, CA, by submitting a false prescription (No.
27 4410158), purportedly prescribed by Dr. Zoppi to Respondent. However, Dr. Zoppi neither
28 authorized prescriptions for Respondent, nor was she a patient.

1 dd. On or about November 30, 2006, Respondent and her husband obtained
2 Hydrocodone (60 Tabs) at Vons Pharmacy in Torrance, CA., by submitting a false prescription
3 (No. 4324841), purportedly prescribed by Dr. Tamarah Mannning to Howard Lefstein. However,
4 Dr. Manning neither authorized prescriptions for Howard Lefstein, nor was he a patient of Dr.
5 Manning. In fact, Dr. Manning is an OB/GYN and has no male patients. Howard Lefstein was
6 identified by Vons pharmacist as individual that picked up the prescription.

7 ee. On or about December 3, 2006, Respondent obtained Hydrocodone (60
8 Tabs) at Walmart Pharmacy in Torrance, CA., by submitting a false prescription (No. 4401339),
9 purportedly prescribed by Dr. Tamarah Mannning to Respondent. However, Dr. Manning
10 neither authorized prescriptions for Respondent, nor was she a patient of Dr. Manning. Howard
11 Lefstein was identified by Walmart pharmacist as individual that picked up the prescription.

12 ff. On or about December 10, 2006, Respondent and her husband obtained
13 Hydrocodone (60 Tabs, 1X Refill) at Vons Pharmacy in Torrance, CA., by submitting a false
14 prescription (No. 4324841), purportedly prescribed by Dr. Tamarah Mannning to Howard
15 Lefstein. However, Dr. Manning neither authorized prescriptions for Howard Lefstein, nor was
16 he a patient of Dr. Manning. In fact, Dr. Manning is an OB/GYN and has no male patients.
17 Howard Lefstein was identified by Vons pharmacist as individual that picked up the prescription.

18 gg. On or about December 11, 2006, Respondent obtained Hydrocodone (60
19 Tabs) at Walmart Pharmacy in Torrance, CA., by submitting a false prescription (No. 4401339),
20 purportedly prescribed by Dr. Tamarah Mannning to Respondent. However, Dr. Manning
21 neither authorized prescriptions for Respondent, nor was she a patient of Dr. Manning. Howard
22 Lefstein was identified by Walmart pharmacist as individual that picked up the prescription.

23 hh. On or about December 4, 2006, Respondent obtained Hydrocodone (40
24 Tabs) at Walgreens Pharmacy in Torrance, CA., by submitting a false prescription (No. 298715),
25 purportedly prescribed by Dr. Tamarah Mannning to Respondent. However, Dr. Manning
26 neither authorized prescriptions for Respondent, nor was she a patient of Dr. Manning.

27 ii. On or about December 8, 2006, Respondent obtained Hydrocodone (50
28 Tabs) at CVS Pharmacy in Torrance, CA., by submitting a false prescription (No. 105798),

1 purportedly prescribed by Dr. Tamarah Mannning to Respondent. However, Dr. Manning
2 neither authorized prescriptions for Respondent, nor was she a patient of Dr. Manning.

3 jj. On or about December 11, 2006, Respondent obtained Hydrocodone (40
4 Tabs, 1X Refill) at Walgreens Pharmacy in Torrance, CA., by submitting a false prescription
5 (No. 298715), purportedly prescribed by Dr. Tamarah Mannning to Respondent. However, Dr.
6 Manning neither authorized prescriptions for Respondent, nor was she a patient of Dr. Manning.

7 kk. On or about December 16, 2006, Respondent obtained Hydrocodone (50
8 Tabs) at CVS Pharmacy in Torrance, CA., by submitting a false prescription (No. 105798),
9 purportedly prescribed by Dr. Tamarah Mannning to Respondent. However, Dr. Manning
10 neither authorized prescriptions for Respondent, nor was she a patient of Dr. Manning.

11 ll. On or about December 18, 2006, Respondent obtained Hydrocodone (40
12 Tabs, 2X Refill) at Walgreens Pharmacy in Torrance, CA., by submitting a false prescription
13 (No. 298715), purportedly prescribed by Dr. Tamarah Mannning to Respondent. However, Dr.
14 Manning neither authorized prescriptions for Respondent, nor was she a patient of Dr. Manning.

15 mm. On or about December 18, 2006, Respondent obtained Hydrocodone (60
16 Tabs, 1X Refill) at Rite Aid Pharmacy in Torrance, CA., by submitting a false prescription (No.
17 717375), purportedly prescribed by Dr. Tamarah Mannning to Respondent. However, Dr.
18 Manning neither authorized prescriptions for Respondent, nor was she a patient of Dr. Manning.

19 nn. On or about May 20, 2007, Respondent obtained Hydrocodone (20 Tabs),
20 at CVS Pharmacy in Torrance, CA., by submitting a false prescription (No. 119804), purportedly
21 prescribed by Dr. Gary Alter to Howard Lefstein. However, Dr. Alter neither authorized
22 prescriptions for Mr. Lefstein, nor was she a patient of Dr. Manning. Respondent diverted the
23 prescriptions forms while working in Dr. Alter's OR.

24 SIXTH CAUSE FOR DISCIPLINE

25 (Obtained Controlled Substances by Fraud or Deceit)

26 21. Respondent is subject to disciplinary action under section 2762,
27 subdivision (a), in conjunction with Health and Safety Code section 11173, subdivision (a), for
28 unprofessional conduct, in that while employed as a registered nurse, Respondent issued forged

1 prescriptions to obtain narcotics, as more fully set forth above in paragraph 20.

2 PRAYER

3 WHEREFORE, Complainant requests that a hearing be held on the matters herein
4 alleged, and that following the hearing, the issue a decision:

5 1. Revoking or suspending Registered Nurse License Number 615418, issued
6 to Kelley Moore Bledsoe aka Kelley Lefstein.

7 2. Ordering Kelley Moore Bledsoe to pay the Board of Registered Nursing
8 the reasonable costs of the investigation and enforcement of this case, pursuant to Business and
9 Professions Code section 125.3;

10 3. Taking such other and further action as deemed necessary and proper.

11 DATED: 6/16/08

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15 RUTH ANN TERRY, M.P.H., R.N.
16 Executive Officer
17 Board of Registered Nursing
18 State of California
19 Complainant
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